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January 4, 2008

Ref: EPR-N

Georgina Lampman
Escalante Ranger District
PO Box 246
Escalante, UT 84726

RE: Draft Environmental Impact Statement for the Pockets Resource Management Project, Escalante Ranger District
CEQ#: 20070480

Dear Ms. Lampman:

Consistent with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Pockets Resource Management Project (PRMP) on the Escalante Ranger District of the Dixie National Forest. The 8,564-acre PRMP is located 22 miles northwest of Escalante, Utah within the Antimony Creek, Coyote Hollow-Antimony Creek, and Pacer Lake watersheds.

The Proposed Action includes 3,715 acres of commercial harvest of spruce/fir timber to remove beetle-infested and recently killed trees and subsequent pre-commercial thinning on 548 acres. Aspen management actions include approximately 350 acres of clear-cutting and 433 acres of treatment to remove understory conifers. Related road management actions include 11.1 miles of new road construction, all of which would be decommissioned following the project. In addition, 7.8 miles of currently unauthorized roads will be designated as NFS roads, 9.5 miles of existing roads will be improved, and an additional 4.3 miles of road will be decommissioned.

Additional Alternatives presented for the project include a range of vegetative treatments that are defined in terms of the availability of roads and alternative access methods. Alternative Two would use the existing road network only and employ the use of helicopters to treat and harvest a portion of the acreages proposed under the Proposed Action. Alternative Three includes an even more limited set of acreages that would be treated using the existing road network, with no helicopters.

EPA concurs with the general need for the proposed salvage and treatment actions to advance identified management objectives for the economic recovery of timber and overall forest condition. The analysis presented in the Draft EIS presents the scientific basis and rationale for proposed actions and explains their consistency with the existing forest management plan and objectives. We agree that these actions will advance structural diversity within the conifer forest and will provide for the long-term viability of aspen.

EPA provided scoping comments for this project in August, 2006. These comments recommended that the Draft EIS document ecological and management history, forest management objectives, land ownership patterns in the project area, and the scientific basis for proposed management actions. EPA also provided several specific suggestions on information that would be useful in characterizing project impacts to aquatic systems, soils, habitat, and forest health. We note that the Draft EIS provides comprehensive information on many of these issues.

EPA's primary concern with the Proposed Action is the potential for water quality impacts resulting from roads in the project area, including increased sedimentation to Antimony Creek. The Draft EIS references several studies that document the poor condition of the stream and riparian zone. The Draft EIS describes the portion of Antimony Creek within the project area as significantly impacted by habitat degradation and fine sediment loads from livestock grazing. Despite degradation within the project area itself, the document characterizes downstream portions of Antimony Creek as in better condition. The analysis presented describes a thriving rainbow trout population one-half mile downstream from the project boundary and presents recent biotic condition assessments indicating a "fair" condition for this portion of the creek.

While projected sediment loads from the proposed vegetation treatments are relatively minimal, increased sediment loading to surface waters from roads and vehicle traffic pose significant potential impacts. This includes a currently unauthorized road and new low-water crossing that will be added on Upper Antimony Creek (along route U4701/G4253). The Proposed Action includes keeping this crossing open to ATVs after completion of the project, creating a persistent source of fine sediment loading to Antimony Creek. This increased sedimentation could have a negative effect on insect and aquatic species and would compromise recent efforts to reduce sediment loads and improve conditions in the creek.

EPA has concerns about the impacts associated with this low-water crossing and recommends that the Forest Service consider eliminating the crossing from the Proposed Action, or at a minimum, improving the crossing to a hardened surface or engineered structure that reduces erosion and sedimentation. Permanent closure of the crossing following the implementation of vegetation treatments should also be considered. Although we acknowledge that livestock and other factors are the most significant sources of degradation to Antimony Creek, this project should not exert a direct or cumulative impact by contributing to further water quality and habitat degradation.

Also, while EPA presumes that this route and crossing is required to facilitate the

proposed vegetation treatments and timber haul, we suggest that the language in the Final EIS further clarify the need for authorizing the route and how its use is related to the vegetation treatments outlined under the Proposed Action. It is unclear whether there are alternatives to the use of U4701, such as FR 30140 (bordering the west side of the project area), that can provide an alternative source of transport to the Antimony Creek-Coyote Hollow area.

EPA has a general concern with the extent of new road construction under the Proposed Action and the potential for environmental impacts. The Proposed Action would result in 11.1 miles of new road construction, all of which would be reclaimed following the project. While EPA acknowledges that Soil and Water Conservation Practices (SWCPs) will be applied to transportation actions and that the net post-project impact of the Proposed Action will result in a lower road density in the area than current conditions, EPA is concerned about long-term water quality and sediment impacts, noxious species, and habitat fragmentation. This is particularly true as project treatments are projected to occur over a six to nine year timeframe. In addition, effective road decommissioning and reclamation of the former road base to pre-disturbance conditions can be difficult to achieve. Resources are also needed to ensure that an effective policing and enforcement program is in place to assure that vehicles do not travel on decommissioned or closed roads. EPA suggests that the Final EIS provide for and characterize the nature of road inspection, evaluation, maintenance, and enforcement activities that will ensure that roads are not adversely impacting environmental resources.

EPA also recommends that the Final EIS include a more thorough discussion of the rationale behind the proposed road management actions and post-project designations. While some details on the road management alternatives for the PRMP are presented on pages 117-119 of the Draft EIS, this section is lacking information on the use of roads following project completion, including the criteria used in determining which currently unauthorized roads are to be designated as NFS roads and which are to be decommissioned.

EPA also notes that a discussion of wetland resources and the measures that will be employed to prevent adverse impacts to wetland and riparian areas is missing from Draft EIS sections on the Affected Environment and Environmental Consequences. A brief set of paragraphs on page 86 maintains that none of the action alternatives would affect floodplains or wetlands and describes the project landscape as including "small wetlands and narrow floodplains associated with seeps, springs and streams." While we find this statement reassuring in a general sense, this section should include some reference to the extent and location of wetland and riparian areas and the mitigation measures that will be employed to protect them as the project is implemented.

EPA has a responsibility to review and evaluate the potential environmental impacts associated with this Draft EIS. Based on the procedures EPA uses to evaluate the adequacy of the information and potential impacts of the Preferred Alternative, EPA is rating the Draft EIS as Environmental Concerns - Inadequate Information,"EC-2." "EC" (environmental concerns) signifies that EPA's review of this Draft EIS has identified environmental impacts that should be avoided in order to fully protect the environment. The rating of "2" indicates that the Draft EIS lacks sufficient information to fully assess environmental impacts that should be avoided in

order to fully protect the environment. A full description of EPA's EIS rating system is enclosed.

EPA appreciates the opportunity to review the Draft Environmental Impact Statement for the Pockets Resource Management Project. We recognize the complexity of the proposed resource management actions and expect that impacts to environmental resources will be assessed and mitigated over time based on the best available science and information. If you would like to discuss these comments, or any other issues related to the review of the Draft EIS, please contact myself at 303-312-6004 or Rich Mylott at 303-312-6654.

Sincerely,

/s/

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure